

1 **JON M. SANDS**

2 Federal Public Defender

3 **ELENA M. KAY**

4 State Bar No. 026391

5 407 W. Congress, Suite 501

6 Tucson, AZ 85701-1310

Telephone: (520) 879-7500

elena_m_kay@fd.org

Attorney for Defendant

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,

11 Plaintiff,

12 vs.

13 Destiny Leticia Alvarez,

14 Defendant.

CR20-0677-TUC-JAS (MSA)

**MOTION TO MODIFY
CONDITIONS OF RELEASE**

(Unopposed, First Request)

15 Defendant Destiny Leticia Alvarez, by and through counsel, hereby requests a
16 modification of her pretrial release conditions. Ms. Alvarez would like to travel to Nogales,
17 Sonora, Mexico on April 18, 2020 to April 20, 2020. She would like to visit her stepfather
18 and will be staying with him at his residence. This address has been provided to her pretrial
19 services officer. Defendant is fully aware that all other conditions of her pretrial release
20 remain unchanged, and she has been made aware that she is to contact her pretrial services
21 officer before she leaves and again upon her return.
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24 Defendant further requests that her United States Passport be returned to her for the
25 sole purpose of this trip, and she will return the passport to pretrial services upon her return
26 to the United States.
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1 Assistant United States Attorney Fred Cocio has been contacted and does not object
2 to this request. United States Pretrial Services Office Brenda Aguilar has also been
3 contacted and does not object.
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5 RESPECTFULLY SUBMITTED this 30th day of March, 2020.

6 JON M. SANDS
7 Federal Public Defender

8 s/ Elena M. Kay
9 ELENA M. KAY
Assistant Federal Public Defender

10 Copy of the foregoing has been provided
11 by electronic transmittal via the CM/ECF System:

12 Fred Cocio – Assistant United States Attorney

13 Brenda Aguilar – United States Pretrial Services Officer
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